REMARKS

Claim 3 has been amended as suggested by the Examiner to overcome the objection thereto. Accordingly, the objection to claim 3 should be withdrawn.

The punctuation in claims 22-24, 46-48, 50-52 and 54-56 has been corrected, as suggested by the Examiner. Accordingly, the objection thereto should be withdrawn.

The objection to claims 25-27 and 45-56 based upon claim 25 being improperly dependent upon multiple dependent claims is respectfully traversed. Claim 25 has been amended to remove the dependency on claims 10, 11 and 14. Accordingly, the rejection to the claims 25-27 and 45-56, should be withdrawn.

New claims 57-59 have been added based upon the correction in the dependency of claim 25.

The rejection of claims 3-14 under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention, is respectfully traversed.

The words "the operator" in each of claims 3-8 has been amended to read "an operator". Accordingly, the rejection of claims 3-14 under 35 USC 112, second paragraph, should now be withdrawn.

The Examiner has rejected claims 1-5, 14-20, 38 and 39 under 35 USC 103(a) as being unpatentable over Hirota et al (USP 6,606,707) in view of Risan et al (US Publ. 2006/0021057). This rejection is respectfully traversed.

Claim 1 is a method claim in which a number N of data reception equipment is matched to a number M of external security modules with each reception equipment provided with the unique identifier and with each external security module having a unique identifier. The method requires memorizing all of the list identifiers of the reception equipment in each data external security module and memorizing the list of identifiers of external security modules in each reception equipment and carrying out a check phase when an external security module is connected to a data reception equipment for verifying the presence of the memorized identifier in the reception equipment and external security modules respectively to authorize access. This is not the process described in Risan et al.

On page 1, paragraph 9 and on page 6, paragraph 71 of Risan, a system is described comprising a first "monitoring" component which creates a first list comprising a plurality of process identification values with each of the plurality of process identification values in the first list being associated with a software application that is accessing a media disposed upon a media storage device, and a second monitoring component which creates a second list of process identification values each of which is associated with a respective software application that is storing data. The system in Risan further comprises a control component for determining that a particular software application is creating an unauthorized copy of the media disposed on the media storage device. The control component also prevent the particular software application from storing a usable copy of the media.

It is to be noted that the process identification values of Risan are not used for matching (pairing) N data reception equipments with M external security modules as is

set forth in claim 1, to authorize or to prevent access to data distributed to said reception equipments based on a check phase and Risan does not teach verifying:

- whether or not the identifier of an external security module is present in a list memorized in the reception equipment and,

- whether or not, the identifier of said reception equipment is present in the list memorized in said external security module, consistent with the check phase of claim 1.

Instead, as set forth in Risan in page 6, paragraph 71, the codec is used to compare the information of the media player application operating on the client computer system with a list of "signatures" associated with the media recording application. This codec comparison in Risan does not result in a pairing of a number N of data reception equipment with a number M of external security modules nor is there any suggestion of this in Risan.

Accordingly, the rejection of claim 1 as being obvious based upon the teaching of Hirota et al in view of Risan, should be withdrawn.

Applicant also wishes to point out the subject application claims a priority date of February 20, 2004, which is earlier than the effective filing date of the Risan et al publication and accordingly, the Risan et al reference is not prior art to the subject patent application.

Claims 2-4, 14-20, 38 and 39 all depend from claim 1 and are therefore believed patentable for the same reasons as given above.

The rejection of claims 6-13, 18, 21, 43-45, 49 and 53 as being obvious under 35 USC 103(a) based upon Hirota and Risan as applied to claim 1 and further in view of the teaching in Tsuria, is respectfully traversed.

As explained heretofore, Risan et al does not teach the pairing of N data reception equipment to M external security modules to authorize or prevent access to data distributed to the reception equipment and does not perform the check phase set forth in claim 1 for determining whether or not the identifier of the external security module is present in the list memorized in the reception equipment and whether or not the identifier of the reception equipment is present in the list memorized in the external security module. This check phase is not performed in Risan et al. Instead, Risan compares the information of the media player application on the client computer system with a list of signatures associated with the media recording application as set forth in page 6, paragraph 71. The newly cited reference Tsuria et al does not teach this pairing method nor does the Examiner allege this. Accordingly, the rejection of claims 6-13, 18, 21, 43-45, 49 and 53, should be withdrawn.

Moreover, as explained above, Risan et al has an effective filing date subsequent to the priority date of applicants priority document.

New claims 57-59 are dependent claims which depend back from claim 1 and are therefore patentable for the same reasons as given above.

Reconsideration and allowance of claims 1-57 is respectfully solicited.

Respectfully submitted,

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